

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

RAUL M. ESPITIA,	:	Case No. C-1-00-531
	:	
Plaintiff,	:	Judge Herman J. Weber
	:	
v.	:	
	:	
THE PROCTER & GAMBLE COMPANY,	:	MEMORANDUM IN SUPPORT OF
et al.,	:	DEFENDANT THE PROCTER &
	:	GAMBLE COMPANY'S BILL OF COSTS
Defendants.	:	

The following is an itemization of costs listed on Defendant The Procter & Gamble Company's Bill of Costs. Supporting Documentation is attached hereto as Exhibit A.

A. Court Reporter Fees For Deposition Transcripts Necessarily Obtained For Defendant's Motion For Summary Judgment

1.	Deposition of Plaintiff Raul Espitia:	\$1544.53
2.	Deposition of Patrick Tewksbury	\$369.00
3.	Deposition of Mary O'Rourke	\$116.10
4.	Deposition of Ray Maynard	\$140.40
5.	Deposition of Tonya King	\$228.00
6.	Deposition of Barbara Lancor	\$219.00
7.	Deposition of Michael Lindsey	\$279.00
8.	Deposition of Kim Zimmer	\$330.00
9.	Deposition of Dwain Carver	\$159.30
10.	Deposition of Tom Winters	\$114.00
11.	Deposition of Tom Brown	\$167.40

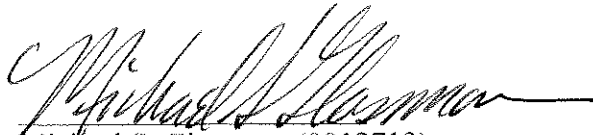
12.	Deposition of Jeff Drago	\$327.00
13.	Deposition of Joe Beer	\$138.00
14.	Deposition of Steve Lighthall	\$183.60
15.	Deposition of Curtis Salyers	\$186.30
16.	Deposition of J. Scarcella	\$ 99.90
17.	Deposition of N. Bess	\$ 105.00
	SUBTOTAL	\$4706.53

B. Duplication Costs (Fees For Printing)

1.	Answer:	
	7 pages X \$0.10/page X 4 copies ¹	\$2.80
2.	Discovery Produced To Plaintiff:	
	1,747 pages X \$0.10/page X 1 copy	\$174.70
3.	Motion For Summary Judgment and Memorandum In Support	
	25 pages X \$0.10/page X 4 copies	\$10.00
4.	Appendix To Motion For Summary Judgment	
	167 pages X \$0.10/page X 4 copies	\$66.80
5.	Reply Memorandum In Support Of Motion For Summary Judgment (with attached Exhibits)	
	64 pages X \$0.10/page X 4 pages	\$25.60
	SUBTOTAL	\$279.90

¹ Includes one Court copy, one opposing counsel copy, one client copy, and one attorney work copy.

Respectfully submitted,



Michael S. Glassman (0012713)
DINSMORE & SHOHL LLP
1900 Chemed Center
255 East Fifth Street
Cincinnati, Ohio 45202
(513) 977-8200

Attorney for Defendant
The Procter & Gamble Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via electronic mail this 15th day of March, 2004 upon Sheila M. Smith and Kelly Mulloy Meyers, Esq., Freking & Betz, 215 East Ninth Street, Fifth Floor, Cincinnati, Ohio 45202 and James B. Robinson, Esq. Kircher Robinson & Welch, 2520 Kroger Building, 1014 Vine Street, Cincinnati, OH 45202-1116.



#809178



LITIGATION SUPPORT SERVICES.

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Job #: 010425LL

Job Date: 04/25/2001

Order Date: 04/25/2001

DB Ref. #:

Date of Loss: 11

Your File #:

Your Client: P&G

Invoice

Invoice #: 17508

Inv. Date: 05/08/2001

Balance: \$1,342.93

Bill To:

Mr. Michael S. Glassman, ESQ

Dinsmore & Shohl LLP

1900 Chemed Center

255 East Fifth Street

Cincinnati, OH 45202-3172

Action: Espitia

VS

P & G

Action #:

Rep: Luke Lavin

Cert:

Item	Proceeding/Witness	Description	Disc. Amt.	Amount
1	Raul M. Espitia	Attendance of Reporter	\$28.00	\$252.00
2	Raul M. Espitia	Attendance Overtime of Reporter	\$7.50	\$67.50
3	Raul M. Espitia	Original Transcript	\$113.72	\$1,023.43
4	Raul M. Espitia	Condensed Transcript	\$0.00	\$0.00
<p>Comments:</p> <p>YOUR DISCOUNT LEVEL IS NOW AT 10%, YOU HAVE SAVED \$149.22</p> <p>Balances over 15 days may be subject to Finance Chg. @ 1.5%</p> <p>Federal Tax I.D.: 31-1469133</p> <p>Terms: Net 15 Days.</p> <p>Sub Total \$1,342.93</p> <p>Shipping \$0.00</p> <p>Tax N/A</p> <p>Total Invoice \$1,342.93</p> <p>Payment \$0.00</p> <p>Balance Due \$1,342.93</p>				

Please KEEP THIS PART for YOUR RECORDS.

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Annette McKeehan SchochRegistered Professional Reporter
Depositions and Court Reporting

BILL TO

Michael S. Glassman, Esq.
Dinsmore & Shohl, LLP
1900 ChemEd Center
255 East Fifth Street
Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2563

6360
2563
8-27-01
1310
72102
9-13-01

FILE NUMBER

TERMS

DEPONENT

P&G/Espitia

Net 30

8-9-01

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - M. O'Rourke	1	129.00	129.00
case volume discount		-10.00%	-12.90
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII		0.00	0.00
Postage/Courier 8-6-01		0.00	0.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depo of: M. O'ROURKE Taken: 8-9-01 Reporter: AS			
Federal ID #: 31-1503265		Total	\$116.10

Annette McKeehan SchochRegistered Professional Reporter
Registered Court Reporter

BILL TO

Michael S. Glassman, Esq.
 Dinsmore & Shohl, LLP
 1900 ChemEd Center
 255 East Fifth Street
 Cincinnati, Ohio 45202-3315

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DATE	INVOICE #
6/21/01	2516

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	4-30-01 A&B

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript #1	1	228.00	228.00
Copy of Transcript #2	1	369.00	369.00
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII		0.00	0.00
Postage/Courier 6-14-01		7.335	7.34
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al. C-1-00-531 Depos of: TONYA KING PATRICK TEWKSBURY Taken: 4-30-01 Reporter: AS			
Federal ID #: 31-1503265			Total \$604.34

 M. Glassman
 6/21/01

Annette McKeehan SchochRegistered Professional Reporter
Courtroom Reporters

BILL TO
Michael S. Glassman, Esq. Dinsmore & Shohl, LLP 1900 ChemEd Center 255 East Fifth Street Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2551

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9-13-01

Handwritten:
4/16/02
9-13-01

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-13-01

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - M. Lindsey	1	279.00	279.00
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII		0.00	0.00
Postage/Courier 8-6-01		5.00	5.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depo of: M. LINDSEY Taken: 7-13-01 Reporter: AMS			
Federal ID #: 31-1503265		Total	\$284.00

*Annette McKeehan Schoch*Registered Professional Reporter
Registered Merit Reporter

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Michael S. Glassman, Esq. Dinsmore & Shohl, LLP 1900 ChemEd Center 255 East Fifth Street Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2560

0360
 2560
 8-27-01
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 72102
 9-13-01

M. Glassman
 9/13-2/13

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-26-01 A-C

DESCRIPTION	QTY	RATE	AMOUNT
Original Transcript - R. Espitia #2	1	224.00	224.00
case volume discount		-10.00%	-22.40
Copy of Transcript - R. Maynard	1	156.00	156.00
case volume discount		-10.00%	-15.60
Copy of Transcript - T. Brown	1	186.00	186.00
case volume discount		-10.00%	-18.60
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII on each		0.00	0.00
Postage/Courier 8-6-01		0.00	0.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depos of: R. ESPITIA (Vol.#2) R. MAYNARD T. BROWN Taken: 7-26-01 Reporter: AS			
Federal ID #: 31-1503265		Total	\$509.40

Annette McKeethan Schoch

by Federal Deposition Reporter
Annette McKeethan Schoch

BILL TO

Michael S. Glassman, Esq.
Dinsmore & Shohl, LLP
1900 ChemEd Center
255 East Fifth Street
Cincinnati, Ohio 45202-3315

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DATE	INVOICE #
8/27/01	2554

6300
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9-13-01

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-20-01 A&B

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - D. Carver	1	177.00	177.00
case volume discount		-10.00%	-17.70
Copy of Transcript - C. Salyers	1	207.00	207.00
case volume discount		-10.00%	-20.70
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII on each		0.00	0.00
Postage/Courier 8-6-01		0.00	0.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depos of: D. CARVER C. SALYERS Taken: 7-20-01 Reporter: AS			
Federal ID #: 31-1503265		Total	\$345.60

*Annette McKeehan Schoch*Registered Professional Reporter
In the State of Ohio**Invoice**

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Michael S. Glassman, Esq. Dinsmore & Shohl, LLP 1900 ChemEd Center 255 East Fifth Street Cincinnati, Ohio 45202-3315

DATE	INVOICE #
8/27/01	2557

6360
2557
8-27-01
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72102
9-13-01

Michael S. Glassman
9/12/01

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-25-01 A&B

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - S. Lighthall	1	204.00	204.00
case volume discount		-10.00%	-20.40
Copy of Transcript - J. Scarcella	1	111.00	111.00
case volume discount		-10.00%	-11.10
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII on each		0.00	0.00
Postage/Courier 8-6-01		0.00	0.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depos of: S. LIGHTHALL J. SCARCELLA Taken: 7-25-01 Reporter: AS			
Federal ID #: 31-1503265			Total \$283.50

Annette McKeehan SchochRegistered Professional Reporter
Registered Professional Reporter

BILL TO
Michael S. Glassman, Esq. Dinsmore & Shohl, LLP 1900 ChemEd Center 255 East Fifth Street Cincinnati, Ohio 45202-3315

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DATE	INVOICE #
8/27/01	2548

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7/6-2-213

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-10-01 A&B

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - J. Drago	1	327.00	327.00
Copy of Transcript - N. Bess	1	105.00	105.00
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII on each		0.00	0.00
Postage/Courier 8-3-01		0.00	0.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depos of: J. DRAGO N. BESS Taken: 7-10-01 Reporter: AS			
Federal ID #: 31-1503265		Total	\$432.00

*Annette McKeehan Schoch*Registered Professional Reporter
Registered Medical Reporter**Invoice**

BILL TO

Michael S. Glassman, Esq.
 Dinsmore & Shohl, LLP
 1900 ChemEd Center
 255 East Fifth Street
 Cincinnati, Ohio 45202-3315

DATE	INVOICE #
8/27/01	2545

6300

2545

8-27-01

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72102

9-13-01

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-5-01

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript	1	138.00	138.00
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII ON EACH		0.00	0.00
Postage/Courier 8-3-01		0.00	0.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depo of: J. BEER Taken: 7-5-01 Reporter: AS			
Federal ID #: 31-1503265		Total	\$138.00

Annette McKeehan SchochAnnette McKeehan Schoch, Reporter
941-4092 or 941-4092

BILL TO

Michael S. Glassman, Esq.
Dinsmore & Shohl, LLP
1900 ChemEd Center
255 East Fifth Street
Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2542

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9-13-01Please
pay 9-30-01

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-3-01 A-C

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - Zimmer	1	330.00	330.00
Copy of Transcript - Lancor	1	219.00	219.00
Copy of Transcript - Winters	1	114.00	114.00
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII on each		0.00	0.00
Postage/Courier 8-3-01		5.00	5.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al. C-1-00-531 Depos of: K. ZIMMER B. LANCOR T. WINTERS Taken: 7-3-01 Reporter: AS			
Federal ID #: 31-1503265			Total \$668.00